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April 9, 2008

VIA FIRST CLASS MAIL AND FACSIMILE (212) 297-0777

Steven L. Kessler, Esq.
122 East 42nd Street, Suite 606
New York, NY 10168

Re: Mark Kapiti v. Raymond W. Kelly, et al., 07 Civ. 3782 (RMB) (KNF)

Dear Mr. Kessler:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department assigned to the defense of the above-referenced matter on behalf of defendants City of New York, Police Commissioner Raymond W. Kelly, and the Property Clerk of the New York City Police Department. Pursuant to City Defendants' Rule 26 obligations, the following are the business addresses of individuals already named as witnesses in Defendants' Initial Disclosures Pursuant to Fed R. Civ. P. 26(A) and referred to in: (1) documents Bates Stamped Numbers 1-18, which were produced to plaintiff on December 24, 2007, supplementing defendants' disclosures pursuant to Rule 26; and (2) documents Bates Stamped Numbers 19-106, which were produced to plaintiff on January 30, 2008, supplementing defendants' disclosures pursuant to Rule 26.

Eva Marie Russo
Deputy Managing Attorney
New York City Police Department
Legal Bureau
Civil Enforcement Unit
2 Lafayette Street, 5th Floor
New York, NY 10007

Tara L. Miles
Customer Account Representative
Honda Financial Services d/b/a American Honda Finance Corporation
600 Kelly Way
Holyoke, Massachusetts 01040-9682

Sergeant George Triffon
Assigned to handle plaintiff's OATH hearing
New York City Police Department
1st Precinct, 16 Ericsson Place
New York, NY 10013

Detective Maureen Mooney
Arresting officer
New York City Police Department
Organized Crime Control Bureau
Brooklyn South/Staten Island Vice Enforcement Unit
1 Police Plaza, Room 1200
New York, NY 10038

Police Officer Patrick Gough
Inspecting Police Officer of vehicle

Rudolph J. Meola, Esq.
Of Counsel for Honda
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14 Corporate Woods Blvd.
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Robert Fodera
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Stephen I. Wohlberg, Esq.
Prior Attorney for Plaintiff
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Maxine Tate, Esq.
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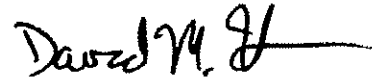
Nancy Anderson
Customer Account Representative Senior
Honda Financial Services d/b/a American Honda Finance Corporation
600 Kelly Way
Holyoke, MA 01040

Gina Klein
New York City Police Department
Legal Bureau
Civil Enforcement Unit
2 Lafayette Street, 5th Floor
New York, NY 10007

Katherine Dmochowski
(address unknown)
On or about date of incident worked for:
New York City Police Department
Legal Bureau
Civil Enforcement Unit
2 Lafayette Street, 5th Floor
New York, NY 10007

Further, enclosed is (1) the New York State Department of Motor Vehicles Police Accident Report concerning plaintiff, bates stamped NYC 108-112; and (2) the State of New York Division of Criminal Justice Services response to defendant's subpoena concerning plaintiff's rap sheet, bates stamped NYC 113. Additionally, in accordance with Fed. R. Civ. P. 26, defendants reserve the right to call any of the individuals named in the enclosed records as witnesses to support their case at trial.

Yours truly,

A handwritten signature in black ink, appearing to read "David M. Hazan", with a stylized flourish at the end.

David M. Hazan
Assistant Corporation Counsel

Enclosure.